

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:	X	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283-LTS
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
	:	
Debtors. ¹	:	
	X	

PRETRIAL INFORMATIVE MOTION

To the Honorable United States District Court Judge Laura Taylor Swain:

Asociación de Maestros Puerto Rico and the Asociación de Maestros de Puerto Rico-Local Sindical (collectively, “AMPR”), by and through their undersigned counsel, submits this Informative Motion in compliance with the *Order Regarding Procedures for Hearing on Confirmation of Plan of Adjustment* (“Order”) [Docket No. 18502],² setting forth guidelines for parties wishing to appear at the Final Pretrial Conference scheduled for November 1, 2021 and the Confirmation Hearing scheduled to start on November 8, 2021 and respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms that are not defined herein have the meanings ascribed to them in the Order.

1. On October 19, 2021, AMPR filed an objection to the confirmation of Debtor's Plan of Adjustment (the "Plan"). (Docket No. 18585).

2. The undersigned counsel, José Luis Barrios Ramos and Melissa López Díaz wishes to appear on behalf of AMPR and participate in the Final Pretrial Conference and Confirmation Hearing on the Plan.

3. Counsel for AMPR intend to present opening argument and closing statements in support of its objection.

4. AMPR wishes to reserve its right to cross-examine any declarant at the Confirmation Hearing.

5. Attached as Exhibit A to this Informative Motion is the completed Party Appearance Sheet required pursuant to the Order.

WHEREFORE, AMPR respectfully requests that the Court take notice of the foregoing.

Dated: October 26, 2021
San Juan, Puerto Rico

By: /s/ José Luis Barrios Ramos
José Luis Barrios-Ramos, ESQ.
USDC No. 223611
PRESTIGE LEGAL SERVICES, LLC
278 Ave. César González
San Juan, Puerto Rico 00918
Telephone: (787) 593-6641
jbarrios@prestigelegalpr.com

/s/ Melissa López Díaz
Melissa López Díaz ESQ.
USDC No. 220607
CANCIO NADAL & RIVERA LLC
403 Muñoz Rivera Ave.
San Juan, Puerto Rico 00918
Telephone: (787) 767-9625
mlopez@cnr.law

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of October, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System, which will notify all counsel of record of such filing to all CM/ECF participants in this case.

/s/ José Luis Barrios Ramos

José Luis Barrios Ramos

EXHIBIT A
PARTY APPEARANCE SHEET

Name of Party	Asociación de Maestros Puerto Rico and the Asociación de Maestros de Puerto Rico-Local Sindical
Party Name Abbreviation (For Use with Zoom)	AMPR
<p>Confirmation Hearing Participant</p> <p>Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party):</p> <ul style="list-style-type: none"> • Name, • Email, • Law Firm, • Phone Number • Docket Entry No. for the Attorney's Notice of Appearance Zoom Screen Name (<u>See</u> Confirmation Hearing Procedures Order, 9(a)) • Is the attorney participating in the Final Pretrial Conference or the Confirmation Hearing or both? <p>or</p> <p>Party-in-interest Not Represented by Counsel:</p> <ul style="list-style-type: none"> • Name, Email, Phone Number, Proof of Claim Number (if any) 	<p>José Luis Barrios Ramos jbarrios@prestigelegalpr.com PRESTIGE LEGAL SERVICES LLC 787-593-6641 Docket Entry No. 18585</p> <p>Melissa López Díaz mlopez@cnr.law Cancio Nadal & Rivera LLC 787-767-9625</p> <p>Participation in the Pretrial Conference and Confirmation Hearing</p>
Plan Objection Docket Entry No.	18585
Witness List Docket Entry No.	N/A
Exhibit List Docket Entry No.	N/A
Other Statement Docket Entry No.	N/A
If a Party files a supplemental Party Appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a "Supplemental" Party Appearance Sheet.	
<p>Note: Pursuant to the Confirmation Hearing Procedures Order ¶ 2, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party-in-interest shall be limited to 2 attorneys at any given time. No amicus appearances on Zoom will be permitted for purposes of the Confirmation Hearing.</p> <p>Parties-in-interest not appearing by counsel must have (i) filed a written objection on behalf of him or herself and/or a statement of support in relation to plan confirmation consistent with either (1) <i>Order Establishing Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith</i> and/or (ii) <i>the Confirmation Hearing Procedures Order</i>.</p>	

EXHIBIT B
PARTY WITNESS COVER SHEET

Name of Party		Asociación de Maestros Puerto Rico and the Asociación de Maestros de Puerto Rico-Local Sindical	
Does the Party intend to offer a witness?		No	
Total Number of Witnesses			
Witness Name	Expert or Fact Witness	Is interpreter required? (Proponent of witness must provide certified interpreter)*	Scope of Testimony

The Court does not provide interpreters for witness testimony.

EXHIBIT C
PARTY EXHIBIT COVER SHEET

Name of Party		Asociación de Maestros Puerto Rico and the Asociación de Maestros de Puerto Rico-Local Sindical
Does the Party intend to offer evidence?		No
Total Number of Exhibits Offered by the Party		
Exhibit Identifier	Docket Entry No.	Description of Exhibit
*If a Party files a supplemental Exhibit Cover Sheet, the Party must include the Docket Entry No. of the original exhibit cover sheet in the new filing which must be clearly marked as a "Supplemental" Exhibit Cover Sheet filing.		
Pursuant to Bankruptcy Local Rule 9037-1(a), parties and counsel are solely responsible for redacting the personal identifiers enumerated in Fed. R. Bank. P. 9037(a)		